

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERNEST L. HALL, (01),
[DOB: 05/07/1963]

and

RODNEY O. ELLISON, (02),
[DOB: 09/30/1967]

Defendants.

Case No. 4:24-CR-00291-001/002-DGK

COUNT ONE:

(Conspiracy to Traffic Firearms)

Both Defendants

18 U.S.C. §§ 933(a)(1), (3), and (b)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT TWO:

(Engaging in Firearm Sales Without a License)

Both Defendants

18 U.S.C. §§ 922(a)(1)(A), 923(a), and
924(a)(1)(D)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class D Felony

**COUNTS THREE, FOUR, FIVE, SIX, SEVEN,
EIGHT, NINE, and TEN:**

(Trafficking Firearms)

Ct. 3, 4, 8, 9 – Defendant Ernest L. Hall

Ct. 3, 5, 6, 7, 8, 10 – Defendant Rodney O. Ellison

18 U.S.C. §§ 933(a)(1) and (b)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT ELEVEN:

(Felon in Possession of Firearms)

Defendant Rodney O. Ellison

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

NMT 15 Years' Imprisonment

NMT: \$250,000

NMT: 3 Years' Supervised Release

Class C Felony

COUNT TWELVE:
(Felon in Possession of Firearm)

Defendant Ernest L. Hall

18 U.S.C. §§ 922(g)(1) and 924(a)(8)
NMT 15 Years' Imprisonment
NMT: \$250,000
NMT: 3 Years' Supervised Release
Class C Felony

FORFEITURE ALLEGATIONS

Both Defendants

18 U.S.C. §§ 924(d) & 934; 28 U.S.C. § 2461(c)

\$100 Mandatory Special Assessment For Each
Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Traffic Firearms)

Between on or about June 15, 2024, and on or about November 26, 2024, said dates being approximate, in the Western District of Missouri and elsewhere, the defendants, ERNEST L. HALL and RODNEY O. ELLISON, knowingly and intentionally combined, conspired, confederated and agreed with each other, and with other persons unknown to the Grand Jury, to ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit, the following firearms:

- A Smith & Wesson, Model SD9VE, 9mm caliber pistol, bearing Serial Number FWT4113;
- A Canik, Model TP9SA, 9mm caliber pistol, bearing Serial Number T647215AT33307;
- A Canik, Model TP9SA, 9mm caliber pistol, bearing Serial Number T6472-22AP00020;
- A Hi-Point, Model 995, 9mm caliber rifle, bearing Serial Number B25304;
- A Davis Industries, Model P, .380 caliber pistol, bearing Serial Number AP016124;

- A Mossberg International (CBC), Model 715P, .22 caliber long rifle pistol, bearing Serial Number CP2204953;
- A Palmetto State, Model PA-15, 5.56/2.23 caliber pistol, bearing Serial Number SCB742294;
- An Anderson Manufacturing, Model AM-15, AR-style pistol bearing Serial Number 24115968;
- An Anderson Manufacturing, Model AM-15, AR-style pistol bearing Serial Number 2404432; and
- An Anderson Manufacturing, Model AM-15, AR-style pistol bearing Serial Number 24141464

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (3) and (b).

COUNT TWO
(Engaging in Firearm Sales Without a License)

Between on or about June 15, 2024, and on or about November 26, 2024, said dates being approximate, in the Western District of Missouri and elsewhere, the defendants, ERNEST L. HALL and RODNEY O. ELLISON, neither being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, contrary to the provisions of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D) and 2.

COUNT THREE
(Trafficking a Firearm)

On or about June 18, 2024, in the Western District of Missouri, the defendants, ERNEST L. HALL and RODNEY O. ELLISON, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Smith & Wesson, Model SD9VE, 9mm caliber pistol, bearing Serial Number FWT4113, to another person in or otherwise affecting commerce, knowing

or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b), and 2.

COUNT FOUR
(Trafficking a Firearm)

On or about June 26, 2024, in the Western District of Missouri, the defendant, ERNEST L. HALL, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Canik, Model TP9SA, 9mm caliber pistol, bearing Serial Number T647215AT33307, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT FIVE
(Trafficking a Firearm)

On or about June 27, 2024, , in the Western District of Missouri, the defendant, RODNEY O. ELLISON, aiding and abetting another individual known to the grand jury, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Canik, Model TP9SA, 9mm caliber pistol, bearing Serial Number T6472-22AP00020, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b), and Section 2.

COUNT SIX
(Trafficking a Firearm)

On or about July 7, 2024, in the Western District of Missouri, the defendant, RODNEY O. ELLISON, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Hi-Point, Model 995, 9mm caliber rifle, bearing Serial Number B25304, to another person

in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT SEVEN
(Trafficking a Firearm)

On or about July 24, 2024, in the Western District of Missouri, the defendant, RODNEY O. ELLISON, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Davis Industries, Model P, .380 caliber pistol, bearing Serial Number AP016124, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT EIGHT
(Trafficking Firearms)

On or about November 19, 2024, in the Western District of Missouri, the defendants, ERNEST L. HALL and RODNEY O. ELLISON, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit: a Mossberg International (CBC), Model 715P, .22 caliber long rifle, bearing Serial Number CP2204953; and a Palmetto State, Model PA-15, 5.56/2.23 caliber pistol, bearing Serial Number SCB742294, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearms by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b), and 2.

COUNT NINE
(Trafficking a Firearm)

On or about November 25, 2024, in the Western District of Missouri, the defendant, ERNEST L. HALL, did ship, transport, transfer, cause to be transported, or otherwise dispose of

a firearm, to wit: an Anderson Manufacturing, Model AM-15, AR-15 style pistol, bearing Serial Number 24115968, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT TEN
(Trafficking Firearms)

On or about November 25, 2024, in the Western District of Missouri, the defendant, RODNEY O. ELLISON, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit: an Anderson Manufacturing, Model AM-15, AR-style pistol, bearing Serial Number 24044432; and an Anderson Manufacturing, Model AM-15, AR-style pistol, bearing Serial Number 24141464, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT ELEVEN
(Felon In Possession Of Firearms)

On or about November 26, 2024, in the Western District of Missouri, the defendant, RODNEY O. ELLISON, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms, to wit: a Heckler and Koch (HK), Model VP9, 9mm pistol, bearing Serial Number 224-112669; an Anderson Manufacturing, Model AM-15, AR-style pistol, bearing Serial Number 24080840; a Hi Point, Model JCP, .40 caliber pistol, bearing an apparent obliterated serial number; a Remington, Model 550-1, .22 caliber rifle, with no visible serial number; a Hi Point, Model JCP, .40 caliber pistol, bearing Serial Number X7289247; and a Glock, Model 33 (Gen 4), .357 caliber

pistol, bearing Serial Number BBAV81; each of which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWELVE
(Felon In Possession Of A Firearm)

On or about November 26, 2024, in the Western District of Missouri, the defendant, ERNEST L. HALL, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, to wit: a Taurus, Model G2G, 9mm pistol, bearing Serial Number TLM86436, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE ALLEGATION ONE

The allegations contained in Counts 1, 3, 4, 5, 6, 7, 8, 9, and 10, above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 934.

As a result of committing the firearms trafficking offenses alleged in Counts 1, 3, 4, 5, 6, 7, 8, 9, and 10, of the Indictment, ERNEST L. HALL and RODNEY O. ELLISON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 934, any and all property constituting, or derived from, any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to a forfeiture money judgment representing proceeds the defendants personally obtained, directly and indirectly, as a result of their participation in the firearms trafficking offenses alleged in Counts, 1, 3, 4, 5, 6, 7, 8, 9, and 10.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 934.

FORFEITURE ALLEGATION TWO

The allegations contained in Counts 11 and 12 above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Count 11 or 12 of the Indictment, ERNEST L. HALL and RODNEY O. ELLISON shall forfeit to the United States any firearms and ammunition involved or used in the commission of the offenses.

A TRUE BILL.

December 17, 2024
DATE

SIGNATURE ON FILE WITH USAO
FOREPERSON OF THE GRAND JURY

/s/D. Michael Green
D. Michael Green
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit One
Western District of Missouri